

ILL. C. C. DOCKET NO. 00-0278

PREPARED DIRECT TESTIMONY  
OF JOHN D. ANDREWS

I.C.C. Docket No. 00-0278

Applicant's Exhibit No. A  
Witness \_\_\_\_\_  
Date 6-7-00  
Reporter \_\_\_\_\_  
JUN 23 3 45 PM '00  
CHIEF CLERK'S OFFICE  
ILLINOIS  
COMMUNICATIONS COMMISSION  
EB

1. Q. Please, state your name, business address and business telephone number.  
A. John D. Andrews  
3664 Andrews Court  
Salem, IL 62881  
(618) 548-5881 telephone  
jandrews@mvn.net
2. Q. What is your affiliation with the Applicant, Lightspeed Telecom, LLC?  
A. Manager and Sole Partner
3. Q. Please, tell us your background in the telecommunications industry.  
A. I, John D. Andrews have a background in telecommunications pricing, tariff filing, designing networks, local and IXC leased line OC12, OC3, DS3/T3, DS1/T1, fractional T1, DS0/56K, POTS, Centrex, channelized T1 and T3, ISDN BRI, ISDN PRI, local and IXC frame relay, And voice over IP (VOIP). I also have experience in procuring services from carriers, installing, configuring, testing, maintaining, and repair. I am familiar with every major interexchange carrier and their contracts, vision, ordering/problem resolution/repair and escalation process. As well as, procuring services from most large local exchange incumbents such as GTE North, GTE South, Ameritech, SouthWestern Bell, Focal, Bell South, Wabash County Telephone, Adams Telephone, Odin Telephone, and many other small Illinois, Missouri, Indiana, Kentucky, and Tennessee independent carriers.
4. Q. I show you a document which has been marked as Applicant's Exhibit No. 1 and ask if you can identify it?  
A. Yes, this is my resume.
5. Q. Do you presently have any other businesses operating, and if so, in what businesses are you engaged?  
A. No.
6. Q. What business, if any, is Lightspeed engaged in at the present time?  
A. None. Lightspeed was formed to provide the services for which authority is requested herein.
7. Q. What is Lightspeed's corporate structure?  
A. Lightspeed is a Limited Liability Company.
8. Q. I show you a do document which has been marked as Applicant's Exhibit No. 2 and ask if you can identify it?  
A. Yes, It is Lightspeed's Articles of Organization as a Limited Liability Company.
9. Q. Does Lightspeed currently possess any telecommunications certificates?  
A. No.
10. Q. What authority is Lightspeed seeking from the ICC in this case?  
A. LIGHTSPEED TELECOM, LLC, requests authority to provide facilities based interexchange services (13-403), facilities based local exchange service (13-405), and resold interexchange and local exchange service (13-404), all within the state of Illinois.

11. Q. What is your business plan for Lightspeed?
- A. LIGHTSPEED TELECOM plans to enter the interexchange markets throughout Illinois and the competitive local exchange carrier market in southern Illinois' Ameritech and GTE areas. It will begin by offering resale of interexchange services and later in the fall add resale of the incumbent's services at competitive rates to accomplish market penetration. Lightspeed will then build and offer competitive facility-based services utilizing the incumbent's unbundled network elements (UNE). As the company business model is perfected, the company will begin to broaden local-exchange coverage areas and bandwidth.
12. Q. Where does Lightspeed propose to provide interexchange services?
- A. LIGHTSPEED TELECOM plans to enter the interexchange markets throughout Illinois, although the initial focus will be on the Salem, Centralia, and Mt. Vernon exchange areas.
13. Q. Where does Lightspeed propose to provide competitive local exchange services?
- A. Lightspeed plans to initially enter the local exchange markets in Centralia, Mt. Vernon, and Salem.
14. Q. How does Lightspeed propose to provide interexchange services?
- A. Lightspeed will enter the markets with very competitive rates and a local office. The interexchange services will initially be provided through an agreement with a Tier I IXC utilizing their wholesale dedicated and switched products. Eventually Lightspeed plans to procure and deploy our own class 5 switch to handle both local and long distance services.
15. Q. How does Lightspeed propose to provide competitive local exchange services?
- A. Lightspeed will enter the markets with very competitive rates and a local office. The local exchange services will initially be provided through a resale agreement with the local incumbent. Eventually Lightspeed plans to deploy our own Class 5 switch becoming a facilities-based CLEC, and lease unbundled network element (UNE) transport and end-user loops from the local Incumbent. Owning facilities will improve Lightspeed's overall operating margins. Lightspeed's switch will be the core platform for generating new revenue streams and providing differentiation from the ILEC.
16. Q. What type of facilities will be required for Lightspeed to provide interexchange telecommunications service and how will those facilities interface and be interconnected with the facilities of other carriers?
- A. Initially Lightspeed will need no facilities other than an agreement with a Tier I IXC to use their interconnect agreements, network, and switch facilities. When Lightspeed deploys a class 5 switch, it will reside in the Centralia exchange we plan to negotiate interconnect and transport agreements with AT&T and McLeodUSA (the only two companies with IXC tandem facilities in the region). Lightspeed will also need negotiated interconnect agreements with the individual incumbent local exchange carrier.
17. Q. What type of facilities will be required for Lightspeed to provide local exchange telecommunications service and how will those facilities interface and be interconnected with the facilities of other carriers?
- A. Initially Lightspeed will need no facilities other than an agreement with the local incumbent of each exchange. This will allow us to use their interconnect agreements, network, and switch facilities. Eventually Lightspeed will need to negotiate interconnect, transport, and co-location agreements with the incumbent local exchange carrier. Included will need to be interconnect for E911, Operator Services, SS7, signaling links, OSS Operation support services, ect.
18. Q. Will the provision of interexchange services by Lightspeed require any facilities to be acquired or constructed?
- A. No. Not initially. Lightspeed plans to acquire a class 4/5 switch that will need to have facilities constructed.

19. Q. Will the provision of competitive local exchange services by Lightspeed require any facilities to be acquired or constructed?
- A. No. Not initially. Lightspeed plans to acquire a class 4/5 switch that will need to have facilities constructed.
20. Q. Will the provision of interexchange service by Lightspeed require any agreements with other telecommunications carriers?
- A. Yes. Lightspeed will negotiate an agreement with a Tier I interexchange carrier. We have a contract and pricing in hand. A Letter of Credit is being issued to the carrier to secure services.
21. Q. Will the provision of competitive local exchange services by Lightspeed require any agreements with other telecommunications carriers?
- A. Yes. Lightspeed will have to negotiate agreements with Ameritech and GTE South for resale and unbundled network elements. LIGHTSPEED TELECOM agrees to file all negotiated agreements with the Illinois Commerce Commission for approval.

LIGHTSPEED recently has contacted the Incumbents to begin the negotiations.

22. Q. What personnel will be required for Lightspeed to provide interexchange services?
- A. A sales person, a receptionist, and myself (as a manager and sales engineer) will meet Lightspeed's initial needs. More personnel will be added as the company grows and when the company offers facilities-based services.
23. Q. What personnel will be required for Lightspeed to provide competitive local exchange services?
- A. A sales person, a receptionist, and myself (as a manager and sales engineer) will meet Lightspeed's initial needs. More personnel will be added as the company grow and when it offers facilities-based services.
24. Q. Will the provision of interexchange services by Lightspeed require any personnel to be hired immediately?
- A. Yes. Lightspeed already has a manager and sales person, although we will need a receptionist/bookkeeper.
25. Q. Will the provision of competitive local exchange services by Lightspeed require any personnel to be hired immediately?
- A. Yes. Lightspeed will need another sales person in addition to the receptionist/bookkeeper, sales person, and manager.
26. Q. Do you have projections of the estimated expenses and revenues associated with the provision of interexchange and local exchange services by Lightspeed?
- A. Yes.
27. Q. I show you a document which has been marked as Applicant's Exhibit No. 3 and ask if you can identify it?
- A. Yes. It is Lightspeed's projected telecommunications revenues and expenses.
28. Q. Do you have projections of the estimated expenses and revenues associated with the provision of exchange services by Lightspeed?
- A. Yes. Attached as Exhibit No. 3 are Lightspeed's current projections.

29. Q. Based upon the projections you just mentioned, will Lightspeed have the financial resources to provide the proposed interexchange and local exchange telecommunications services?
- A. Yes. LIGHTSPEED TELECOM, LLC, and its sole partner have provided initial capitalization of \$46,100.00. The company will meet expenses with vendor leasing agreements and principal capital investment. I have vast experience in raising venture capital and other methods of financing.
30. Q. Will Lightspeed have the technical and managerial resources to provide the proposed services?
- A. Yes.
31. Q. Will you yourself be involved in the operations of Lightspeed?
- A. Yes. I will directly manage Lightspeed.
32. Q. Who are the officers and/or managers and/or partners of Lightspeed Telecom, LLC?
- A. John D. Andrews is the manager and sole partner. Currently there are no other partners.
33. Q. Briefly describe the background and experience of the officers, managers, employees and partners who will be directly involved in the competitive operations of Lightspeed, other than yourself.
- A. John D. Andrews has a background in telecommunications in pricing, tariff filing, designing networks, local and IXC leased line OC12, OC3, DS3/T3, DS1/T1, fractional T1, DS0/56K, POTs, Centrex, channelized T1 and T3, ISDN BRI, ISDN PRI, local and IXC frame relay, voice over IP, procuring services from carriers, installing, configuring, testing, maintaining, repairing, familiar with every major interexchange carrier and their contracts, vision, ordering/problem resolution/repair escalation process, and also have worked with and procured services from most large local exchange incumbents such as GTE North, GTE South, Ameritech, SouthWestern Bell, Focal, Bell South, Wabash County Telephone, Adams Telephone, Odin Telephone, and many other small Illinois, Missouri, Indiana, Kentucky, and Tennessee independent carriers.
34. Q. I show you a document which has been marked as Applicant's Exhibit No. 4 and ask if you can identify it?
- A. Yes. It is our GAAP (Generally Accepted Accounting Practice) chart of accounts for our accounting system.
35. Q. How will Lightspeed bill for its services?
- A. LIGHTSPEED TELECOM, LLC, will bill on a monthly basis.

The bills will be detailed, listing services, features, surcharges, and taxes.

A reputable service bureau under contract will bill local exchange and interexchange customers for our company. LIGHTSPEED TELECOM will be responsible for collection and remittance of any ITAC line charge, 9-1-1-line charge, etc.

36. Q. How will billing disputes be handled?
- A. Initially the operation will have only a few employees and I will handle all billing issues personally. In time as our staff grows it will institute the plan stated below.

LIGHTSPEED TELECOM, LLC will conduct business with a focus on customer service.

LIGHTSPEED TELECOM, LLC, will handle billing disputes expeditiously and fairly. The company will meet all state standards and compliance as set forth in the Illinois Public Utilities Act.

36. (continued)

Customers will be able to contact the company via phone, mail, facsimile, or in person.

LIGHTSPEED TELECOM, LLC, has a physical office located in the area to better serve our customers.

Salem Illinois Exchange:                      3664 Andrews Court  
Salem, IL 62881  
(618) 548-5881 telephone or facsimile

First contact - Customer service representative opens a customer complaint file. The customer support representative has certain latitude and authority to resolve a general complaint.

If Resolved - Customer complaint file closed and reported for monthly review.

If Not Resolved - Should the customer's problem lack resolution, it is escalated to Supervisor. Supervisor will investigate the complaint and work toward a mutual resolution with the customer.

If Resolved - Trouble ticket closed and reported for monthly review.

If Not Resolved - should the customer's problem still lack resolve, the problem is then brought before the partnership (principal) for review and after careful consideration our company will determine if issue has been handled adequately.

The customer will be notified verbally and by mail of this decision and their right to file a complaint against us with the commission if our decision does not meet their approval.

The notification will offer all of the appropriate Illinois Commerce Commission's contact information.

37. Q. Are you aware of and will Lightspeed comply with 83 Illinois Administrative Code Part 735 regarding establishment of credit, billing, deposits, termination of service and issuance of telephone directories?

A. Yes. Lightspeed will abide by 83 Illinois Administrative Code Part 735 (hopefully with consideration to 735.180) procedures governing the establishment of credit, billing, deposits, termination of service and issuance of telephone directories for local exchange telecommunications carriers in the state of Illinois.

LIGHTSPEED TELECOM, LLC, requests a waiver for part 735.180 which requires directory publication. In the community various local directory publications are currently duplicated (Ameritech, McCleodUSA, county directories, etc.). This practice of duplication causes much confusion and frustration to community patrons as well as being burdensome and costly. LIGHTSPEED TELECOM is currently negotiating agreements with an Incumbent Carrier to publish all of its local exchange customers in their existing directories as part of the Unbundled Network.

38. Q. How will Lightspeed provide a directory?
- A. LIGHTSPEED TELECOM is currently negotiating agreements with an Incumbent Carrier to publish all of its local exchange customers in their existing directories as part of the Unbundled Network Element.

39. Q. How will trouble reports be handled by Lightspeed?
- A. LIGHTSPEED TELECOM, LLC, will handle trouble reports expeditiously. The company will meet all state standards and compliance as set forth in the Illinois Public Utilities Act.

LIGHTSPEED TELECOM will have technical assistance available 24/7. Lightspeed will eventually have it's own installation and repair staff, when the company becomes facilities-based. Since Lightspeed will initially be reselling services, we will have to work in coordination with the incumbent carrier for unbundled network elements (UNE) and other carriers/service providers to repair service in a timely manner.

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LIGHTSPEED TELECOM, LLC, has a physical office located in the area to better serve our customers.

Salem Illinois Exchange: 3664 Andrews Court  
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40. Q. Who will be the ICC Staff's contact at Lightspeed for consumer complaints?
- A. John D. Andrews
41. Q. Are you aware of and will Lightspeed comply with 83 Illinois Administrative Code Part 705 regarding preservation of records of telephone utilities?
- A. Yes. LIGHTSPEED is aware and will comply with Preservation of Records of Telephone Utilities in accordance to 83 Illinois Administrative Code Part 705. APPENDIX A - Schedule of Records and Periods of Retention
42. Q. Are you aware of and will Lightspeed comply with 83 Illinois Administrative Code Parts 720 and 725 regarding 9-1-1 implementation reports and standards of service for 9-1-1 emergency systems?
- A. Yes. Lightspeed is aware and will comply with implementation reports and standards of service for 9-1-1 emergency systems. Lightspeed contacted and met with the local Marion County 9-1-1 coordinator.

Tom Ling, ENP  
1999 South Marion Avenue  
P.O. Box 1175  
Salem, IL 62881  
(618) 548-3685 phone  
(618) 548-9539 fax  
(618) 5454-8582 pager/voice mail  
[cma911@hotmail.com](mailto:cma911@hotmail.com) e-mail

43. Q. How will emergency call be handled?
- A. E911 traffic will be handed off to the local incumbent of each territory for routing. Salem exchange customer dials for 911 support. The call is routed through Ameritech's Centralia switch and ported back to the Salem Local Police Department for processing and resolution of the call.

43. (continued)

Centralia exchange customer dials 911. The call is routed to Belleville through Ameritech's switch and ported back to the Centralia Police Department for processing and resolution of the call.

44. Q. How will 9-1-1 work if Lightspeed is granted a Certificate for local exchange service?

- A. Initially Lightspeed will be resale of the local service, so the incumbent will handle the call. Eventually Lightspeed plans to deploy a class 4/5 switch, at which time we will negotiate an agreement with Ameritech so the 911 traffic will be handed off to them as the local incumbent. LIGHTSPEED will negotiate construction and maintenance of the 911 data base with the incumbent. Reporting will be sent to SCC Inc. (303) 581-5600 which currently assists the Incumbent with the 911 database. Lightspeed will update 911 daily. Lightspeed's billing system will be able to distinguish between resale and facilities based service for the collection of 911 surcharge.

45. Q. Who will be the ICC Staff's contact at Lightspeed for 9-1-1 issues?

- A. John D. Andrews

46. Q. How will Lightspeed be accounting for the Illinois Gross Receipt Tax?

- A. Lightspeed's billing system will be able to distinguish between resale and facilities based service for the collection and remittance of Illinois Gross Receipt Tax, other taxes and surcharge. With the approval of the commission, Lightspeed will use GAAP accounting.

47. Q. What waivers is Lightspeed requesting for its long distance telecommunications business?

- A. Parts 710 and 735 of the 83 Illinois Administrative Code for interexchange service authority.

LIGHTSPEED TELECOM, LLC, requests a waiver for part 710 because strict compliance with the Uniform System of Accounts would be a burdensome and costly hardship to the company. LIGHTSPEED TELECOM will maintain all accounting records in accordance with Generally Accepted Accounting Principles (GAAP) which will accurately reflect the company's financial status. Complying with part 710 would require the creation and maintenance of two sets of accounting books, one under the Universal System of Accounts and the other under GAAP. Maintenance of books under both systems would create an adverse monetary effect for the company.

LIGHTSPEED TELECOM, LLC, also requests a waiver for part 735 of the 83 Illinois Administrative Code under interexchange carrier service authority. This part is relevant only to our local exchange customers and not to the interexchange services.

48. Q. What waivers is Lightspeed requesting for its competitive local exchange telecommunications business?

- A. Parts 710 and 735.180 of the 83 Illinois Administrative Code for local exchange service authority.

LIGHTSPEED TELECOM, LLC, requests a waiver for part 710 because strict compliance with the Uniform System of Accounts would be a burdensome and costly hardship to the company. LIGHTSPEED TELECOM will maintain all accounting records in accordance with Generally Accepted Accounting Principles (GAAP) which will accurately reflect the company's financial status. Complying with part 710 would require the creation and maintenance of two sets of accounting books, one under the Universal System of Accounts and the other under GAAP. Maintenance of books under both systems would create an adverse monetary effect for the company.

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48. (continued)

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duplication causes much confusion and frustration to community patrons as well as being burdensome and costly. LIGHTSPEED TELECOM is currently negotiating agreements with an Incumbent Carrier to publish all of its local exchange customers in their existing directories as part of the Unbundled Network Elements.

49. Q. Will Lightspeed cooperate with the Universal Telephone Assistance Corporation (UTAC) and the Illinois Telecommunications Access Corporation (ITAC)?
- A. Yes. LIGHTSPEED TELECOM will join the Universal Telephone Assistance Corporation and will solicit quarterly, collect and remit to UTAC the voluntary contributions collected monthly from its telephone subscribers to support the Universal Telephone Service Assistance Program (UTSAP) and report to the commission quarterly.
50. Q. Will Lightspeed participate in programs for the hearing impaired?
- A. Yes. Although most of these services will be resold from the incumbent local exchange carrier.
51. Q. How will Lightspeed support the Universal Telephone Service Assistance Program (UTSAP)?
- A. LIGHTSPEED TELECOM will offer the waivers on installation and monthly recurring costs associated with the Universal Telephone Service Assistance Programs (UTSAP). Lightspeed is aware of the dollar amounts needed to provide for Lifeline and Link Up.
52. Q. How will Lightspeed support the Lifeline Program?
- A. Until LIGHTSPEED TELECOM becomes an Eligible Telecommunications Carrier, we will not be eligible for Lifeline or Link Up reimbursements. Eligibility for ETC and participation in the "Link Up" program are adopted by the FCC in 47 CFR 54.411 et seq. as of October 1, 1997.
53. Q. Are you aware of and will Lightspeed comply with 83 Illinois Administrative Code Parts 755, 756, and 757 regarding telecommunications access for persons with disabilities, telecommunications relay service and telephone assistance programs?
- A. LIGHTSPEED TELECOM will abide by the regulations as prescribed in 83 Illinois Administrative Code Part 755 and 756, "Telecommunications Access for Persons with Disabilities" and "Telecommunications Relay Service", respectively. This will be met initially by resale of the incumbent's service offering.
- LIGHTSPEED TELECOM will also abide by the regulations as perscribed in Illinois Public Utilities Act and 83 Illinois Administrative Code Part 757. LIGHTSPEED TELECOM will join the Universal Telephone Assistance Corporation and will solicit, collect and remit to UTAC the voluntary contributions collected monthly from its telephone subscribers to support the Universal Telephone Service Assistance Program (UTSAP).
54. Q. Are you aware of and will Lightspeed comply with 83 Administrative Code Part 772 regarding pay-per-call services?
- A. Yes.

55. Q. What is Lightspeed's policy on slamming?

- A. Our methods to verify carrier changes will require the potential or current customer's signature on an authorization form, known as a Letter of Agency (LOA). "LOAs need to be severable from any sweepstakes entry forms". The LOA contains: (1) the consumer's intent to change; (2) the consumer's information (phone number(s) to be changed, name as appears on phone bills, and address); (3) a statement that the consumer agrees to designate the new carrier as the agent to make the change; and (4) that the consumer understands that a fee for the change may be charged to the consumer.

Lightspeed will abide by state legislation, Senate Bill 1567, requires that if a consumer's long-distance phone service is changed or enhanced phone service is added, the consumer must be notified of the changes in writing within 10 days and given the opportunity to cancel, or there must be independent third-party verification of the changes by telephone to obtain the consumer's consent.

The written notice must: (1) be sent via first class mail, postage pre-paid; (2) be a separate document from billing; (3) be sent to the consumer no later than 10 days after the carrier has changed the service; (4) be written in 10-point typeset or larger; (5) be written in plain language that describes the change; (6) contain a toll free number for the consumer to contact if they wish to cancel the change.

Lightspeed will also provide a PIC restriction or PIC freeze to our local exchange service customers at no charge... but with no guarantees, representations, promises or warranties, either express or implied, that their local service, IntraLATA service, and InterLATA/InterState service can not be changed. PIC restriction is not absolute due to the resold services of other carriers.

56. Q. How will Lightspeed solicit local exchange customers?

- A. Lightspeed will have ribbon cuttings, informational seminars, radio advertisements, newspaper advertisements, television advertisements, flyers, direct informational mailers, bill boards, booths at local home shows, join chamber of commerce, sponsorships, and many other promotional means. Best of all will be word of mouth.

57. Q. Does this conclude your pre-filed direct testimony?

- A. Yes.